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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J. PARDINI IN SUPPORT OF PLAINTIFF WAYMO LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL ITS SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF ITS MOTION FOR ORDER TO SHOW CAUSE WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT OF THE PRELIMINARY INJUNCTION ORDER AND EXPEDITED DISCOVERY ORDER (DKT. 2053)**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Second Supplemental Brief in Support of Its Motion for Order to Show Cause Why Defendants Should Not Be Held in Contempt of the Preliminary Injunction Order and Expedited Discovery Order (Dkt. 2053).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 5	Red Boxes
Exhibit 6	Designated pages (see below, ¶ 3)

3. The red boxes in Exhibit 5 contain highly confidential information from the Indemnification Agreement, including financial terms and personal addresses and contact information, that the Court previously decided merited sealing. (Dkt. 653.) Exhibit 6 contains these same Indemnification Agreement terms as Exhibit 5, on pages UBER00098549-UBER00098554.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Supplemental Brief and supporting exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of October, 2017 at San Francisco, California.

/s/ Thomas J. Pardini

Thomas J. Pardini

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

Dated: October 27, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ